

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SARAH EDMONDSON, et al.,

Plaintiffs,

v.

KEITH RANIERE, et al.

Defendants.

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CIVIL ACTION NO. 20-CV-485-EK-CLP

**JOINT MOTION FOR ENTRY OF STIPULATED
ESI PROTOCOL AND PROTECTIVE ORDER**

Plaintiffs, Sarah Edmondson et al. (“Plaintiffs”), and Defendants Keith Raniere, Clare Bronfman, and Sara Bronfman (“Defendants”) (collectively, the “Parties”),¹ by their undersigned attorneys, respectfully request that this Court enter the Stipulated Protocol Concerning Discovery of Electronically Stored Information (“ESI Protocol”), attached hereto as Exhibit A, and the Stipulated Protective Order, pursuant to Federal Rule of Civil Procedure 26(c), attached hereto as Exhibit B. In support of their motion, the Parties state the following:

1. The Parties require the entry of the ESI Protocol to govern the format in which document productions are made and discovery-related issues are handled.
2. The Parties require the entry of the Protective Order to facilitate the exchange of confidential information between the Parties.
3. Until the ESI Protocol and Protective Order are in place, the Parties cannot begin producing documents.

¹ Pro se Defendant Danielle Roberts has declined to participate in the negotiations concerning the ESI Protocol and Protective Order. Plaintiffs provided Ms. Roberts with notice of this joint motion, but she has declined to state her position.

4. Counsel for the Parties have stipulated to the ESI Protocol and Agreed Confidentiality Order.

5. WHEREFORE, the Parties respectfully request that this Court enter the ESI Protocol and Agreed Confidentiality Order.

Respectfully Submitted,

Dated: June 30, 2025

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